PRP COMMITTEE FOR THE NL INDUSTRIES/TARACORP SITE

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April 18, 1995

BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Susan Pastor
Community Involvement Coordinator
Office of Public Affairs (P-19J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: NL Industries/Taracorp Superfund Site
Granite City, Illinois
Comments on the February 1995 Proposed Plan

Dear Ms. Pastor:

This document is submitted for inclusion in the Administrative Record for the NL Industries/Taracorp Superfund Site (the "Site") in Granite City, Illinois by AlliedSignal Inc., AT&T Corp., Exide Corporation, General Battery Corporation, Gould, Inc., Johnson Controls, Inc., and NL Industries, Inc. This document summarizes and draws conclusions from the following attached document: "Review and Comment on the USEPA Proposed Groundwater Remedy for the NL Industries/Taracorp Superfund Site, Granite City, Illinois" by Geraghty & Miller, Inc., April 1995 (hereinafter "the Geraghty & Miller Comments").

Background

The Site was placed on the National Priorities List ("NPL") in 1986. Between 1987 and 1990, NL Industries conducted a Remedial Investigation ("RI") and a Feasibility Study ("FS") at the Site. During the RI/FS, NL Industries submitted a work plan to the United States Environmental Protection Agency ("U.S. EPA") which included a plan for groundwater investigation at the Site. U.S. EPA accepted NL Industries' work plan, including the groundwater sampling methodology contained in the plan. After the RI/FS was completed, NL Industries concluded that no groundwater remediation was required at the Site. U.S. EPA agreed with this conclusion in its January 10, 1990 Proposed Plan. On March 30, 1990, U.S. EPA issued a Record of Decision ("ROD") for the Site, again concluding that no groundwater remediation was necessary at the Site.

In the Second Addendum to the Feasibility Study dated February 1995 and the February 1995 Proposed Plan, U.S. EPA now concludes that groundwater pumping, treating (if necessary) and disposal to the local Publicly Owned Treatment Works ("POTW") is necessary for the Main Industrial Area. As shown in the Geraghty & Miller Comments and as summarized below, U.S. EPA's proposed groundwater remedy as set forth in the February 1995 Proposed Plan is unwarranted because it is based on an improper interpretation of the groundwater data at the Site.

Summary of the Geraghty & Miller Comments

The Geraghty & Miller Comments are briefly summarized below and should be consulted for more detail.

1. U.S. EPA has overestimated the true metals concentrations in the groundwater by only considering the analytical results of unfiltered groundwater samples. The more appropriate groundwater sampling methodology for metals is either filtering samples or collecting samples with low flow techniques.

2. Geraghty & Miller's reinterpretation of the data, which excluded the unfiltered samples unless sampled by low flow techniques, indicates that the average metals concentrations are below the Maximum Containment Levels ("MCLs"), except for cadmium, and below the Illinois Groundwater Quality Standards ("IGQSs"), except for cadmium and lead. However, the average concentrations of cadmium and lead exceeded the MCLs and IGQSs only because high concentrations in a few wells skewed the averages higher. When these wells are excluded, the average cadmium concentrations actually fall below the MCLs and IGQSs, and the average lead concentrations fall below the MCLs and are only 1.3 times the IGQSs.

3. The remedy proposed by U.S. EPA is unwarranted because the groundwater does not pose a risk to human health. The groundwater is not used for potable purposes at or around the Site. As a result, there is no exposure pathway and no risk to the citizens of Granite City.

4. Most importantly, U.S. EPA's proposed groundwater pumping remedy simply would not work. The elevated metals concentrations in the samples collected by U.S. EPA were due to high turbidity in the samples. In other words, the metals concentrations in the samples were caused by metals in the sediments, not by metals dissolved in the groundwater. When groundwater recovery wells are installed as part of a groundwater pumping system, they must be designed to minimize the sediments in the extracted groundwater to avoid damage to pumps and other equipment. Thus, the extracted groundwater would at most contain low levels of metals while the vast majority of the metals would remain tied to the sediments and would be immobile and unrecoverable.

5. Even if elevated levels of metals did exist in the groundwater at the Site, which does not appear to be the case, a remedy based on capping the source area to reduce infiltration, natural attenuation and monitoring would provide the same protection to human health and the environment as U.S. EPA's proposed remedy and would be much less costly.

Conclusion

For the reasons listed above and as stated in more detail in the Geraghty & Miller Comments, U.S. EPA's proposed groundwater remedy for the Main Industrial Area consisting of pumping, treating (if necessary), and disposal to the local POTW is unwarranted.

Sincerely,

Louis F. Bonacorsi /wco

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Attachment

cc: John H. Grady, Esq.